

**3:24-mj-00240**

DISTRICT OF OREGON, ss:

AFFIDAVIT OF TAPARA SIMMONS, JR.

**Affidavit in Support of a Criminal Complaint and Arrest Warrant**

I, TaPara Simmons, Jr, being duly sworn, do hereby depose and state as follows:

**Introduction and Agent Background**

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been since February 2023. I am currently assigned to the FBI Portland Field Office (PD) Violent Crimes Against Children (VCAC) and Violent Incident Crime – Domestic (VIC-D) team, where I investigate violations of federal law, including but not limited to bank robberies, crimes against children, and other violent crimes. As a Special Agent with the FBI, I have received extensive training in law enforcement techniques and in conducting these types of investigations. I am trained in investigating a wide variety of violations of federal criminal law having received over 800 hours of training at the FBI Academy. As a federal agent, I am authorized to investigate violations of laws of the United States, and as a law enforcement officer, I am authorized to execute warrants issued under the authority of the United States. Prior to joining the FBI, since March 2019, I was a sworn federal law enforcement officer for the United States Secret Service in Washington, DC. I am part of the Portland Child Exploitation Task Force (CETF), which includes FBI Special Agents and Task Force Officers. The CETF is an intelligence-driven, proactive, multi-agency investigative initiative to combat the proliferation of child pornography/child sexual exploitation facilitated by an online computer. As part of my duties as a federal agent, I work with local, state, and other federal agencies on joint investigations of federal offenses.

2. This affidavit is submitted in support of a criminal complaint and arrest warrant charging ERLEND SECRET VIKAR (“VIKAR”), birth name Joshua Evan Huff, with 18 U.S.C.

§ 2251(a), which prohibits using, persuading, inducing or enticing a minor to engage in sexually explicit conduct for the purpose of producing child sexual abuse material. As set forth below, I have probable cause to believe that VIKAR committed this crime.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

#### **Applicable Law**

4. 18 U.S.C. § 2251(a) prohibits, among other things, a person from employing, using, persuading, inducing, enticing, or coercing a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, if that visual depiction was transported or transmitted using any means of facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

5. “Child pornography” is defined in 18 U.S.C. § 2256(8) and includes any visual depiction of a child under the age of 18 years engaged in sexually explicit conduct. “Sexually explicit conduct” is defined under 18 U.S.C. § 2256(2) and includes sexual intercourse, whether genital-genital, oral-genital, anal-genital, or oral-anal; bestiality; masturbation; sadistic or masochistic abuse; and the lascivious exhibition of the genitals, anus, or pubic area of any person.

***AW makes report in Germany following contact with VIKAR***

6. On or about August 6, 2023, Adult Witness (AW) in Frankfurt, Germany, submitted an online tip to the FBI National Threat Operations Center (NTOC) to report that her daughter, Minor Victim 2 (MV2), born XX/XX/2005, had been in contact with an individual known to her as Erlend VIKAR on Discord since she was 16 years old. VIKAR used the username “dahorse.” AW reported that VIKAR first gained MV2’s trust and then “demanded pornographic videos and photos” from her. AW further reported that VIKAR sent “photos and videos with pornographic content” and enticed MV2 to “contact other men for pornographic acts.”<sup>1</sup>

7. On or about August 9, 2023, AW responded to an email from an FBI Special Agent. The following is a screenshot of the response with personally identifiable information redacted:

██████████ schrieb am Mi., 9. Aug. 2023, 22:14:

Thank you for your Response. I am the mother of the victim. She turned 18 last Week. She started talking to him since she was 16. I will send u all Informations and evidence I have. He used the Name Erlend Vikar. My daughter told me that she also saw his ID. He lives in Portland/Beaverton Oregon. My Daughter also told me that he moves places a lot. His current adress is supposed to be above an indian cafe/Restaurant close by the railroad Track. His birthday allegedly is the 23.6 and is the age between 37-39. He also was in the military during his 20s from which he also has a tattoo on his left underarm which you can see on one of the pictures. The email adress he allegedly uses is from a third party supplier ([pnwdiv@goldfoyle.com](mailto:pnwdiv@goldfoyle.com)). My Phone number is ██████████. You can contact me anytime. My english is not that good so an interpreter in german or greek would be good.

Thank you

8. On or about August 10, 2023, AW emailed FBI Special Agents and provided further information. AW specified that VIKAR lived in the Beaverton or Portland area, was between the ages of 37 and 39, his birthday was June 23, and that he served in the military during his 20’s. AW provided a photo of VIKAR from a web page called “University Tutor,” where he was listed as a Private Tutor in Beaverton, Oregon, using the name “Josh H.” I reviewed an investigative report provided to AW from a private detective and observed that VIKAR legally changed his name from “Joshua Evan Huff” to “Erlend Secret VIKAR” on or about July 16, 2021. AW further clarified

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<sup>1</sup> AW has not yet provided Agents with images of child sexual abuse material (CSAM) due to her residing in Germany.

that VIKAR's Discord username was "DaHorseMF#5869," his email address was "pnwdiv@goldfoyle.com," and that VIKAR had been communicating with MV2 since she was 16 years old.

9. On or about August 14, 2023, FBI Special Agents, interviewed AW with the assistance of a language analyst. AW told the interviewers that on January 2, 2022, an unknown user contacted MV2 on Reddit. AW reported the incident to local law enforcement but had not received a response. After hiring a private detective, the unknown user was identified as VIKAR.<sup>2</sup> VIKAR was interested in making friends with MV2, who felt lonely while being homeschooled during the COVID-19 pandemic. VIKAR and MV2 continued conversations on Discord with VIKAR using the "DaHorseMF#5869" account. Per AW, VIKAR knew MV2 was 16 at the time and told MV2 that he was older. VIKAR shared a photo of his state identification card with MV2 as proof of his identity. AW advised that VIKAR wanted to have an "open relationship" with MV2 and asked her to "behave in a childish way." He also instructed MV2 on what she should eat to stay small, since she had the appearance of a thirteen-year-old girl.

10. AW advised that VIKAR and MV2 had exchanged nude photos on Discord. About a week before the August 2023 interview, AW took MV2's computer and other electronic devices to prevent communications between MV2 and VIKAR. Per AW, VIKAR attempted to convince MV2 to travel to Portland after she turned 18, and she believed that VIKAR had been grooming MV2.

11. On or about August 10, 2023, AW provided FBI Special Agents with images that she stated were distributed from VIKAR to MV2. The images consisted of multiple nude photos

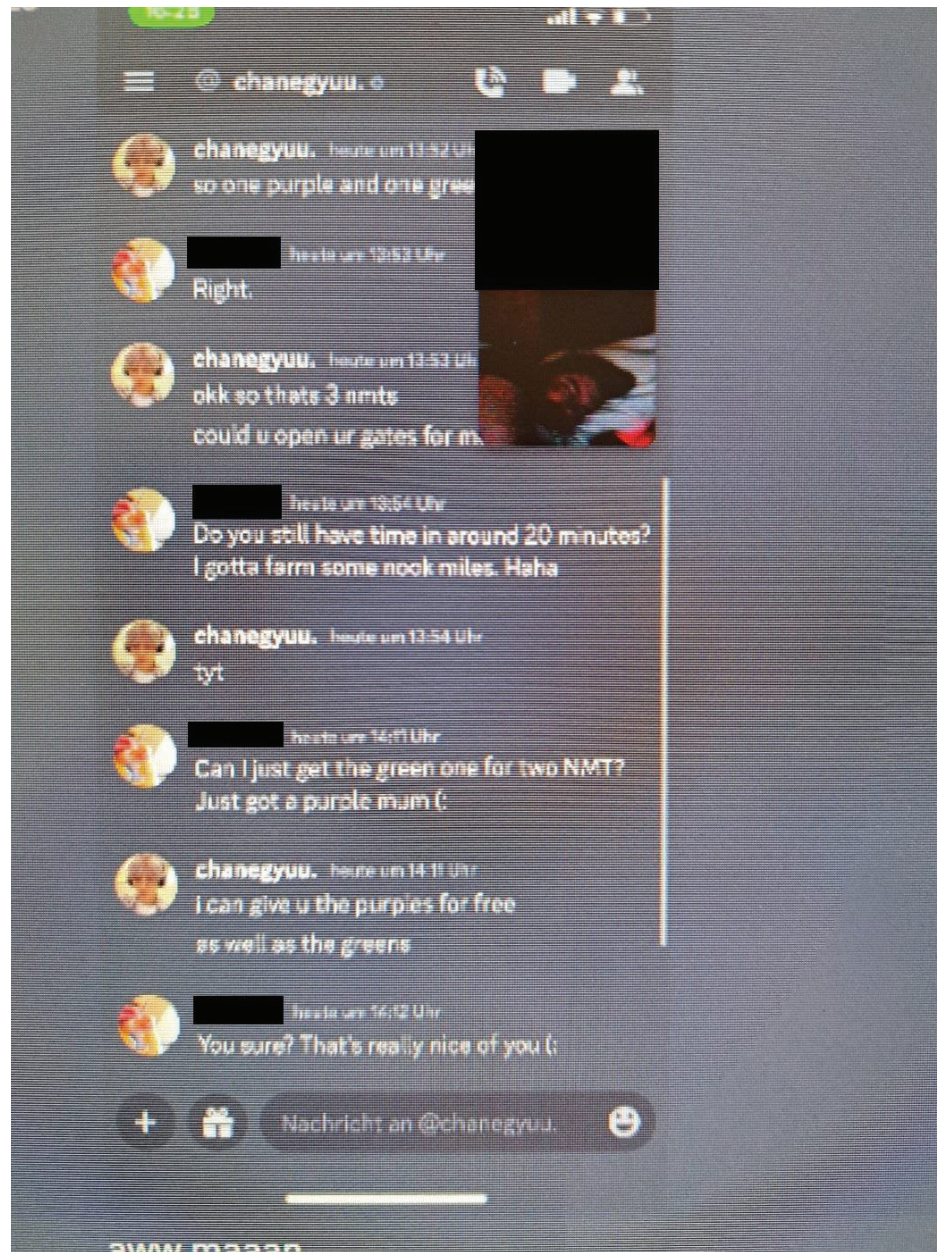
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<sup>2</sup> Additional details pertaining to VIKAR's identification are located in the "identification" section of this affidavit, including the information that the private detective was able to gather about the individual with whom MV2 was communicating with online, who was later determined to be VIKAR.

of an adult male that appears to have a beard and a small tattoo on his left forearm. In five of the images, VIKAR appears to be masturbating, urinating, or manually displaying his penis to the camera. Below is photo provided by AW that was received by MV2 from the individual, and a screen capture of MV2 and DaHorseMF#5869 utilizing video chat:







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12. Using a law enforcement database, I located a Department of Motor Vehicles photo of VIKAR. Comparing that photo with the photos above, the individual in the photos that were sent to MV2, and provided to me by AW, appear to be VIKAR. VIKAR's driver's license photo is below:



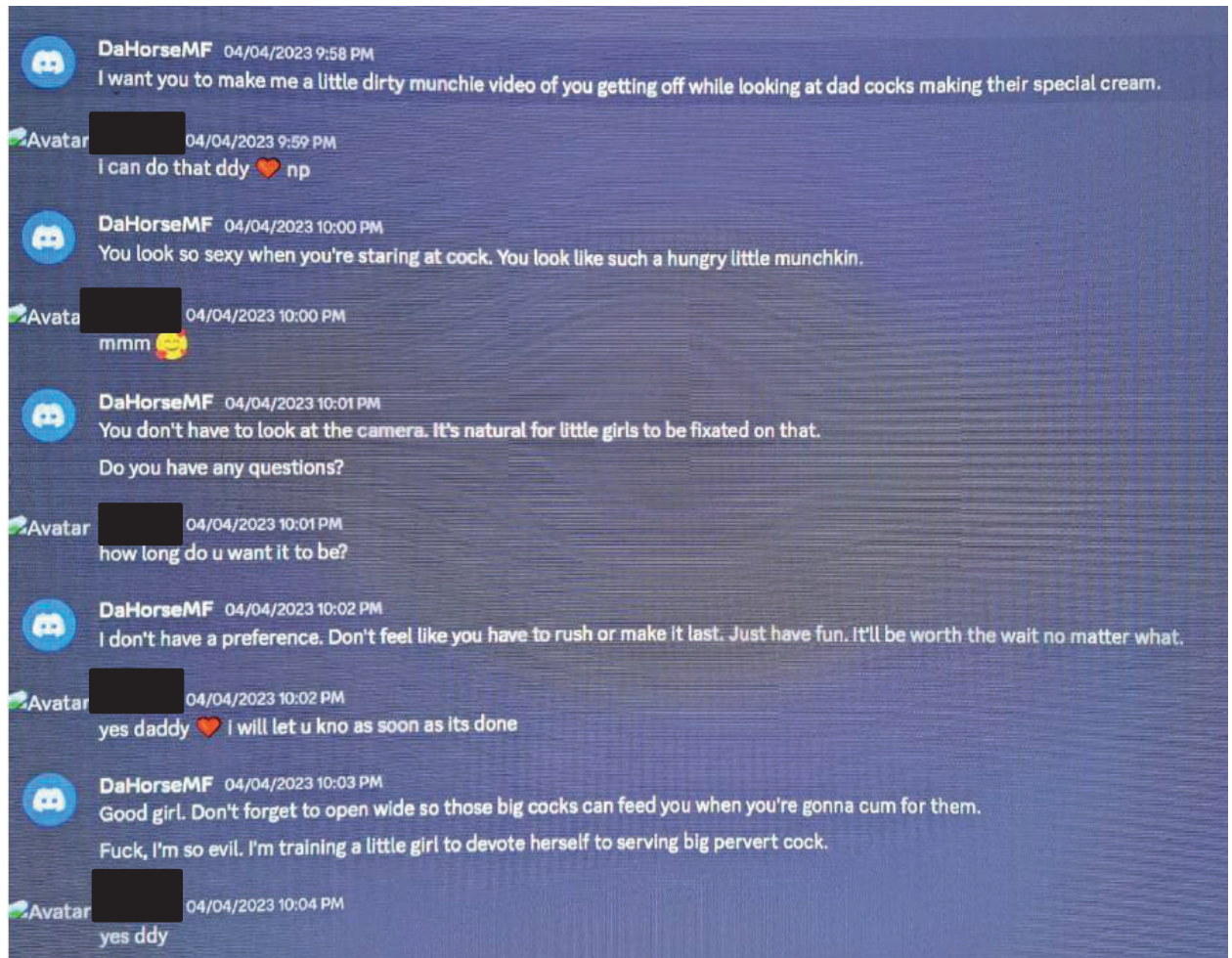
***AW provides Discord Chats between MV2 and VIKAR***

13. On or about October 18, 2023, FBI Special Agents reviewed screenshots AW took of the Discord chat messages between VIKAR and MV2. Throughout the conversation, VIKAR refers to MV2 as "little" and "bby" and refers to himself as "papa" and "ddy." Agents observed the following message from VIKAR sent on or about March 25, 2023, "There's a special handshake for the fun daddies we can talk to like this, and the others we have to keep this secret from. Do you know how to show a man that you're a smart baby who knows what little girls are for?" Based on my training and experience, it should be noted that subjects often advise children to keep their communications private to evade law enforcement.

14. It appears that VIKAR and MV2 had been in contact for over a year. I believe this because VIKAR stated in the chats that, "A year ago, I felt so guilty and wanted so badly to find a way to accommodate them [MV2's parents]."



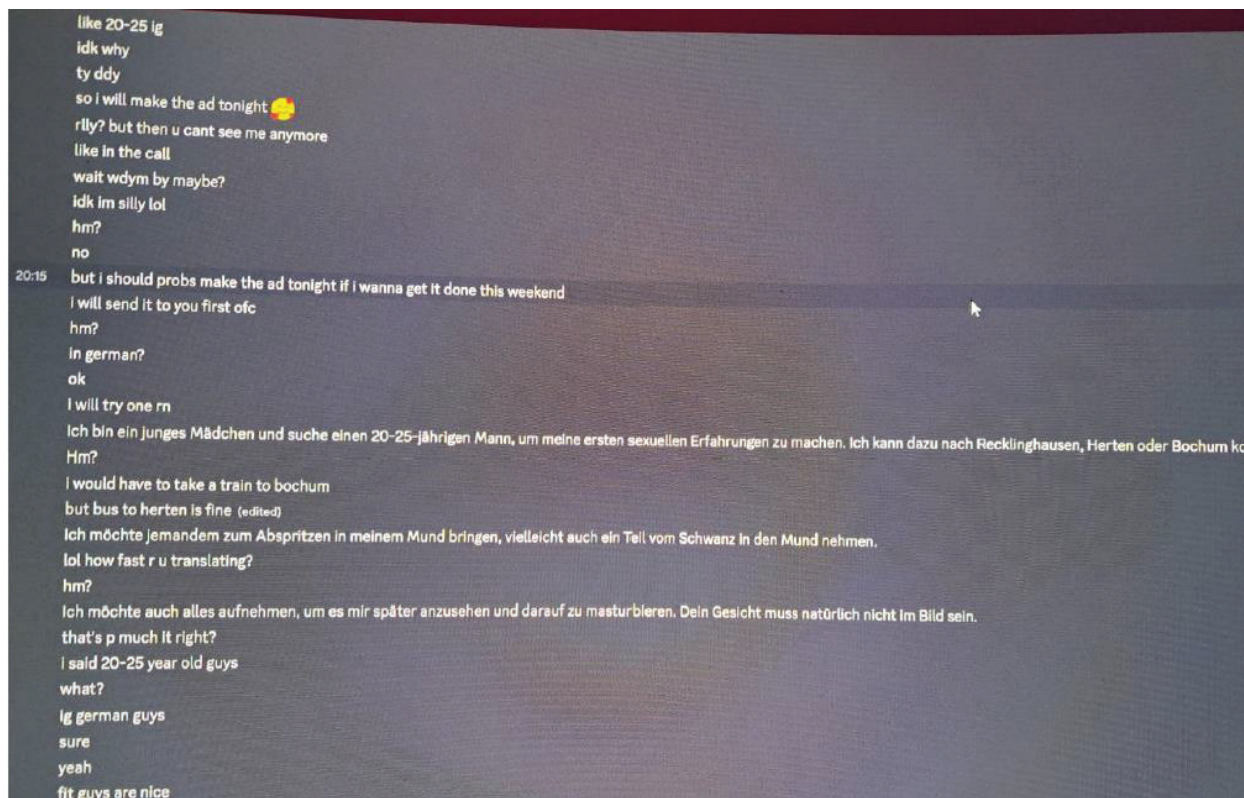
15. FBI Special Agents observed partial chat conversations from on or about April 4, 2023, where it appears that VIKAR is instructing MV2 to film herself masturbating while watching men ejaculate. VIKAR advises MV2 that she does not have to look at the camera when she films herself, but he requests that she open her mouth so “those big cocks can feed you when you’re gonna cum for them.” The following is a screenshot that contains an excerpt of that conversation:



16. AW also sent screenshots of what appears to be VIKAR advising MV2 that she should “make an ad” for “20-25-year-old guys” for her first sexual experience. Based on the



structure of the chat messages, it appears that VIKAR was speaking to MV2 via audio messaging, while she replied via text message.<sup>3</sup> Below is a screenshot that contains MV2's chats:



17. On or about November 1, 2023, an FBI Linguist translated the German portion of text observed in the chat conversation. The following is a transcription of each German message.

- Line 1: "I am a young girl and I am looking for a 20 - 25-year old man to gain my first sexual experiences. For that, I can to Recklinghausen, Herten or Bochum"
- Line 2: "I would like to get someone to ejaculate in my mouth, perhaps also take part of the dick in my mouth."
- Line 3: "I would also like to record everything to view it later and to masturbate to that. Your face, of course, does not need to be in the recording."

### ***Discord Search Warrant Return***

<sup>3</sup> The screenshots provided did not include a date or timestamp, and only the relevant portion of the chats is provided.

18. On or about September 1, 2023, I submitted a subpoena to Discord, Inc., for account information related to username “DaHorseMF#5869,” “Evikar,” “pnwdiv@godfoyle.com,” “Erlend Secret Vikar,” “Joshua Evan Huff,” and any associated accounts. On or about October 3, 2023, Discord returned the following information:

- Username DaHorseMF#5869, User ID: 1077214828067815455, display name: DaHorseMF; Last seen IP: 73.240.230.231
- User ID: 616452552220737564, display name: evikar; Last seen IP: 73.240.230.231
- User ID: 880805567357145108, display name: justcallmesnake. Last seen IP: 73.240.230.231

19. Based upon the information provided by AW, NCMEC, and Discord, I sought a federal search warrant authorizing the search of the “DaHorseMF#5869,” “evikar,” and “justcallmesnake” Discord accounts. On or about November 29, 2023, Magistrate Judge Jolie Russo, District of Oregon, issued federal search warrant, Case No. 3:23-mc-1026, for the search of these accounts. In response, Discord provided records on January 2, 2024. The records provided showed that the user behind the accounts, VIKAR, requested and obtained sexually explicit images and videos from MV2 and distributed sexually explicit images to MV2 in return. Additionally, the return shows multiple sexually explicit chat conversations between VIKAR and MV2. Based on the structure of the conversations, it appears that VIKAR live video streams MV2 while MV2 uses text messaging to communicate.

20. I observed multiple chat conversations between VIKAR and MV2 that, based on my training and experience, exhibit commonly used grooming tactics. On or about November 10, 2022, VIKAR and MV2 (Deleted User 46176b18#8219) have a conversation on Discord where VIKAR instructs MV2 on how to obfuscate their communication and where to communicate so

her parents will not know if they take her laptop or phone. VIKAR advises MV2 to use applications such as “Keybase” and “Github”<sup>4</sup> to communicate with him due to the fact that they are not “chat apps.”

21. During that same November 10, 2022, conversation, VIKAR and MV2 discuss living together and the sexual acts they would perform on each other. VIKAR made the following statements, “I know it’s really sick, but sometimes I imagine you getting pregnant. And I’d instruct you to blame it on being raped by a stranger.” Additionally, he stated, “I think about breeding you while you’re 17, and you receiving your Abi<sup>5</sup> with a little baby bump.” In the chat, VIKAR acknowledges that his words and behavior are illegal. VIKAR states, “This would be illegal in the state I’m from. This would be felony sexual assault. And the judge wouldn’t listen when I told him you liked it.” And “I wish I could take you back to the states so this was rape.” VIKAR refers to MV2 multiple times as his “sex toy” and “cum dump.”

22. On or about December 4, 2022, it appears that MV2 distributes a Keybase video labeled “lol\_im\_a\_cocksucker.mov” to VIKAR. VIKAR asks MV2 if she wants “to listen to me [VIKAR] enjoying it?” VIKAR then advises MV2 that he knows how to turn off the icon in firefox that is commonly displayed when a live chat session is taking place.

23. On or about December 7, 2022, it appears VIKAR and MV2 initiated a video call. Based on my observation, a phone call is documented on Discord as a blank time slot on the search warrant returns, as in the picture below.

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<sup>4</sup> According to open-source research, Keybase is a secure messaging and file-sharing application, and Github is a platform used by software developers to create, store, manage and share their codes.

<sup>5</sup> “Abi” is short for “Abitur.” According to open-source research, the Abitur is the certification that a student has successfully completed the German college preparatory educational program.

2022-12-07 20:17:19.48400 Deleted User 46176b18#8219	do you want me to use headphones to be safe? in case u accidentally unmute			
2022-12-07 20:16:24.45600 Deleted User 46176b18#8219				
2022-12-07 20:16:13.26200 Deleted User 46176b18#8219	good night papi			
2022-12-07 20:16:02.01500 justcallmesnake#0	Say goodnight, little baby.			
2022-12-07 20:15:50.78100 Deleted User 46176b18#8219	i love that			

24. Based on the chat log, throughout the conversation, VIKAR and MV2 communicated through Discord video calling. In many instances in the chat log, a call is initiated and only MV2's text is displayed. To hide the fact that they are video chatting, it appeared that MV2 would use the Discord text function and VIKAR would use audio, while both simultaneously could see each other. Many times, in the chat, VIKAR would request MV2 to live stream her body or live stream herself watching pornography and masturbating. Below is an excerpt from the Discord chats where it appears that VIKAR is requesting MV2 to watch pornography and masturbate.

2023-01-26 08:06:36.968000 Deleted User 46176b18#8219	can u see								
2023-01-26 08:05:24.664000 Deleted User 46176b18#8219									
2023-01-26 08:05:16.009000 justcallmesnake#0	Okay.								
2023-01-26 08:05:05.646000 Deleted User 46176b18#8219	ok im ready 8Y*								
2023-01-26 08:02:36.548000 Deleted User 46176b18#8219	ok ddy 8d, one sec								
2023-01-26 08:02:21.981000 justcallmesnake#0	I want to watch you ride and look at dicks.								
2023-01-26 08:01:24.087000 Deleted User 46176b18#8219	it's easier, def 8d, so first look at dicks, then ride? or do you want me to put the laptop somewhere else?								
2023-01-26 08:00:32.531000 justcallmesnake#0	Is it easy to be a little rider?								
2023-01-26 07:59:53.944000 Deleted User 46176b18#8219	touching will be hard tho bc i got my period, is that okay?								
2023-01-26 07:59:26.385000 Deleted User 46176b18#8219	FFFFF pls								
2023-01-26 07:59:20.124000 justcallmesnake#0	I'll watch you look at dicks. How about that?								

25. In addition to video chatting, it appeared that VIKAR requested MV2 to chat with adult men on Reddit for the purpose of filming them having sex as discussed above in paragraphs 15-17. On or about January 27, 2023, the following conversation occurred:<sup>6</sup>

**Vikar:** I'm gonna take a short nap. What do you think of being a good little slut on reddit while I watch? (would it be difficult to talk there and here?)

**MV2:** i like that (it would be managable 8• 8i,• )<sup>7</sup> give me a sec ok ddy?

**Vikar:** Sure. (Maybe it would be easiest to have me on a call and do the reddit thing on your laptop?)

**MV2:** "(ur so smart ddy)

**MV2:** btw i got a response from an older german guy just a few mins ago, i asked what his

<sup>6</sup> For brevity, the chat conversations are not transcribed in their entirety. Breaks and other texts occur during the conversation that are not noted in the referenced chats.

<sup>7</sup> Due to Discord formatting, emoji symbols are displayed as a collection of symbols, numbers, and letters. All illegible clusters of text correlate to an unknown emoji.



kinks are and he says he likes having dirty sexi outdoors and also likes what i mentioned

**MV2:** maybe i can sext with him ðŸŸ°

**Vikar:** Sure, baby. You can do whatever you like.

**MV2:** ok im ready â• ðŸ•

**Vikar:** Okay, go ahead.

**MV2:** initiated a video call.

**MV2:** cant hear

**MV2:** i asked to see his cock

**MV2:** i can

**MV2:** yeah

**MV2:** how much of my body

**MV2:** like a waist pic?

**MV2:** ok ill take it

**MV2:** brb ok?

**MV2:** like that?"

Following this exchange, MV2 attached an image with filename, "IMG\_3393." The image appeared to be a slender white female with her shirt lifted, her midriff and underside of her breasts exposed, with "IVO" written on her stomach. Based on these chats, it is unclear what "IVO" stands for. Oftentimes, individuals soliciting children online will request them to write various usernames on their body to prove authenticity.

26. On or about March 18, 2023, it appears that VIKAR asks MV2 to take a photo of a child, who MV2 refers to as her three-year-old cousin. MV2 tells VIKAR that it would be weird and states, "theyre gonna be like "oh so now you wanna take a picture with her? you never liked her. why do you wanna do that now?" like it'll be so annoying." MV2 advises VIKAR that she took a shower video for him. MV2 shared a screenshot of a chat message between MV2 and "erso4ver," file name: 1086687563428941954-IMG\_3694.png. The image shows two videos with loading bars under them, one labeled "sexi" and one labeled "normal." The images both appear to be MV2 crouching nude in a bathtub. Due to the image being a screenshot of a video actively uploading, it is unknown what is displayed in the video. The screenshot does not display MV2's genitals, and her hair is partially covering her breasts.

27. On or about May 3, 2023, VIKAR told MV2 that he is going to "try jerking off and going straight to sleep." VIKAR then asks MV2, "Would it be safe for you to pose for me a little?" MV2 advises VIKAR that she can "get naked" for him and VIKAR responds with "I actually like it when you're clothed but moving it out of the way for me." MV2 advises VIKAR that she will call him shortly and VIKAR states, "Pretend you are sneaking away so I can bend you over and use you before anyone notices." It then appears from the conversation that MV2 is communicating with VIKAR via text while he talks to her.

28. MV2 then distributed the following video to VIKAR.

**File Name:** 1103369731852996608-IMG\_4140

**Description:** A 51-second video of MV2 bending over in front of a camera exposing her anus and vagina. MV2 is on her hands and knees on a bathroom floor and is wearing a grey sweater and has grey sweatpants pulled down to her knees. At approximately :10 seconds MV2 manually spreads her buttocks exposing her anus and at approximately :44 seconds MV2 strokes her anus with her fingers.

29. MV2 then messaged VIKAR, "i'll tell you i'm just a kid when you pound my ass into submission" and "i'll tell you you're the bestest dad in the world when you shoot your hot daddy cream inside me."

***Prior NCMEC report***

30. On or about October 5, 2023, FBI Special Agents requested any NCMEC Cybertip reports regarding online usernames known to be used by VIKAR, including but not limited to, "evvikare," "evikar," and "justcallmesnake." Later that same day, NCMEC returned Technical Assistance report #170339. Contained therein, Cybertip 85224077 was listed for username "evvikare."

31. On or about January 29, 2021, Minor Victim 1 (MV1), who was 17 years old, reported to the National Center for Missing and Exploited Children (NCMEC) that she met an individual named Joshua online on the Reddit application.<sup>8</sup> MV1 stated that she and Joshua communicated on the online social media applications, Instagram and Discord, when she was 16 years old. In the NCMEC report, MV1 reported that the individual she spoke to was located in Portland, Oregon, and used the Reddit username “Evvikare” and Instagram username “@jimaho86.” Following the initial report, MV1 contacted the NCMEC telephone hotline and reported that the person goes by the name “Evan,” but his real name was “Joshua.”

32. MV1 reported to NCMEC that she was “threatened, sexually abused, asked to video cam, requested to meet up, and pressured into sending sexual images of myself by a 34-year-old man while I was 16.” Cybertip Report 85224077 was generated and, based on the location of MV1, was disseminated to the San Jose Police Department in California. According to the Cybertip report, the San Jose Police Department closed their lead on or about April 4, 2022, due to lack of response from MV1. This individual was determined by FBI agents to be Joshua Evan Huff. On or about July 16, 2021, Huff changed his name to “Erlend Secret VIKAR.”

33. On or about October 19, 2023, the Federal Bureau of Investigations (FBI) Portland Field Office requested that FBI Agents in San Francisco conduct an interview of MV1 to obtain additional information regarding the allegation. On or about November 9, 2023, a Special Agent from FBI San Francisco advised me that she contacted MV1 over the phone. The Special Agent stated, initially, MV1 was cooperative and willing to be interviewed. MV1 later became distraught and was unresponsive to Agent communications.

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<sup>8</sup> Based on Open-Source research, Reddit is defined as an American social news aggregation, content rating, and discussion website. Registered users submit content to the site such as links, text posts, images, and videos, which are then voted up or down by other members.

***Vikar traced to an address in Portland, Oregon***

34. On or about October 27, 2023, Comcast Cable responded to a subpoena for IP address 73.240.230.231. The subscriber assigned to that IP address was Erlend Vikar, telephone number 971-427-8967, email user ID pnwdiv.

35. All of the aforementioned Discord accounts were accessed using IP address 174.174.49.243, which resolves to Comcast Cable and geolocates on or around 7350 SW Barbur Blvd. Portland, Oregon 97219 – which was revealed to be VIKAR’s residence in law enforcement databases. On or about May 3, 2023, when VIKAR requested MV2 to “pose” for him and received the 51-second video described in paragraph 28 of this affidavit, the account “DaHorseMF” was using IP address 174.174.49.243 at the time of the receipt of the child pornography.

36. With the information provided from AW, FBI Staff Operation Specialists conducted database checks on VIKAR which yielded VIKAR’s Social Security Number, his Oregon driver’s license, and a birthday that matched the information given by AW.

***Surveillance of VIKAR’s addresses***

37. On or about April 25, 2024, FBI Agents conducted surveillance at 7350 SW Barbur Blvd. Apt. 21, Portland Oregon 97219. A blue Honda Civic was in the parking spot in front of apartment #21. The vehicle was not registered to VIKAR. No vehicles are registered to VIKAR’s name.

38. The FBI submitted a subpoena to Fulton Apartments for information regarding the resident in apartment #21. Fulton Apartments returned the following information:

- Erlend Vikar
- Move-In Date: May 25, 2023
- Move-Out: Approximately February 4, 2024
- Phone: 971-427-8967
- Email: [pnwdiv@goldfoyle.com](mailto:pnwdiv@goldfoyle.com)
- Forwarding Address: 44 Kingston Drive #129, Daleville, Virginia 24083



39. Open-source research indicated that 44 Kingston Drive #129, Daleville Virginia, 24083 resolved back to a P.O. Box located inside a United Parcel Service (UPS) location. On or about May 7, 2024, the FBI submitted subpoenas to Equifax, Trans Union, and Experian for information about VIKAR. Trans Union and Experian returned the address, 41 Reserve Boulevard Apartment 203, Daleville, Virginia 24083, as associated with VIKAR.

40. On or about July 18, 2024, an FBI surveillance team conducted surveillance at 41 Reserve Boulevard Apartment 203, Daleville, Virginia 24083. Movers with Two Men and a Truck were observed loading furniture into the truck. VIKAR was observed loading furniture into a vehicle, entering the passenger-side, and followed the moving truck to 172 Tinkerview Drive, Cloverdale, Virginia 24077. VIKAR was observed leaving from and returning to 172 Tinkerview Drive, Cloverdale, Virginia 24077 during subsequent surveillance.

41. On or about October 17, 2024, an FBI surveillance team conducted surveillance at 172 Tinkerview Drive, Cloverdale, Virginia 24077. VIKAR was observed outside of the front of the premises. A black Dodge Caravan picked up VIKAR and dropped him off at Valley View Mall, 4737 Valley View Boulevard NW, Roanoke, Virginia. A photo of VIKAR outside of the premises is below.

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42. On October 22, 2024, a query of law enforcement databases for Erlend Secret VIKAR showed the premises listed as his current address.

***Search Warrant Executed - 172 Tinkerview Drive, Cloverdale, Virginia 24077***

43. On October 29, 2024, Richmond FBI executed a Federal search warrant issued in the Western District of Virginia signed by Magistrate Pamela Meade Sargent, on VIKAR's residence at 172 Tinkerview Drive, Cloverdale, Virginia 24077 and his person. Upon execution of the search warrant, VIKAR was present in the residence and immediately detained for safety of the FBI personnel. VIKAR refused to speak when agents arrived.

44. Richmond FBI Computer Analysis Response Team (CART) conducted an on-site search of a hard drive that was located in VIKAR's residence. The CART team located two videos on that hard drive, dated October 2022. Both videos displayed MV2 on a bed fully nude. Her genitalia were fully exposed at various points of the video. Additionally, MV2 was manually manipulating her genitals throughout the videos. Based on the aforementioned facts of the investigation, I believe the videos observed on VIKAR's hard drive are consistent with the video observed of MV2 located on VIKAR's Discord search warrant return.

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**Conclusion**

45. Based on the foregoing, I submit there is probable cause to believe that ERLEND SECRET VIKAR committed violation of Title 18, United States Code, 2251(a) and request issuance of a warrant for this crime.

46. Prior to being submitted to the Court, this affidavit, the accompanying complaint, and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Eliza Carmen Rodriguez. AUSA Rodriguez advised me that in her opinion, the affidavit is legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

By phone pursuant to Fed. R. Crim. P. 4.1

TAPARA SIMMONS, JR.

Special Agent

Federal Bureau of Investigation

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 5:02 p.m. on October 29, 2024.

*Stacie F. Beckerman*

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HONORABLE STACIE F. BECKERMAN  
United States Magistrate Judge